

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT HUNTINGTON**

**JONATHAN R., et al.,**

*Plaintiffs,*

**v.**

**JIM JUSTICE, in his official capacity as  
Governor of West Virginia, et al.,**

**Case No. 3:19-cv-00710**

*Defendants.*

**NOTICE OF DEPOSITION OF PAMELA M.  
WOODMAN-KAEHLER**

Please take notice that the plaintiffs, Jonathan R., *et al.*, by and through their counsel, will take the deposition of **Pamela M. Woodman-Kaehler** for the purpose of discovery and/or evidence, via Zoom video conferencing, on Friday, July 23, 2021, beginning at 10:00 a.m.

Attorneys will be provided with video link and call-in instructions via e-mail from TSG Reporting. These depositions will be taken before a notary public authorized to administer oaths and will continue during normal business hours from day to day until concluded. You are hereby invited to attend and protect your interests.

**JONATHAN R., ET AL.,  
Plaintiffs,  
By Counsel**

/s/ Richard W. Walters  
Richard W. Walters, (WVSB #6809)  
[rwalters@shafferlaw.net](mailto:rwalters@shafferlaw.net)  
J. Alexander Meade, (WVSB #13021)  
[ameade@shafferlaw.net](mailto:ameade@shafferlaw.net)  
Shaffer & Shaffer, PLLC,  
2116 Kanawha Boulevard, East  
Post Office Box 3973  
Charleston, West Virginia 25339-3973  
Tel: (304) 344-8716  
Fax: (304) 344-1481

/s/ Marcia Robinson Lowry  
Marcia Lowry, *admitted pro hac vice*

[mlowry@abetterchildhood.org](mailto:mlowry@abetterchildhood.org)

Allison Mahoney, *admitted pro hac vice*

[amahoney@abetterchildhood.org](mailto:amahoney@abetterchildhood.org)

Dawn Post, *admitted pro hac vice*

[dpost@abetterchildhood.org](mailto:dpost@abetterchildhood.org)

Aarti Iyer, *admitted pro hac vice*

[vmclaughlin@abetterchildhood.org](mailto:vmclaughlin@abetterchildhood.org)

Tavi Unger

[tunger@abetterchildhood.org](mailto:tunger@abetterchildhood.org)

A Better Childhood

355 Lexington Avenue, Floor 16

New York, NY 10017

Tel.: (646) 795-4456

Fax: (212) 692-0415

/s/ Lori Waller

Disability Rights of West Virginia

Lori Waller, (WVSB #11303)

[lwaller@drofwv.org](mailto:lwaller@drofwv.org)

1207 Quarrier Street, Suite 400

Charleston, WV 25301

Tel: (304) 346-0847

Fax: (304) 346-0687

***Attorneys for Plaintiffs***

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT HUNTINGTON

JONATHAN R., *et al.*,

*Plaintiffs,*

v.

JIM JUSTICE, in his official capacity as Governor  
of West Virginia, *et al.*,

Case No. 3:19-cv-00710

*Defendants.*

**CERTIFICATE OF SERVICE**

I, Richard W. Walters, counsel for Jonathan R., *et al.*, do hereby certify that on this **18<sup>th</sup>** day of **June, 2021**, I electronically filed a “*Notice of Deposition of Pamela M. Woodman-Kaehler*” with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

Philip J. Peisch, Esquire  
Caroline M. Brown, Esquire  
Rebecca E. Smith, Esquire  
Julia M. Siegenberg, Esquire  
Brown & Peisch PLLC  
1233 20th Street NW, Suite 505  
Washington, DC 20001

Steven R. Compton, Esquire  
West Virginia Attorney General’s Office  
812 Quarrier Street, 2nd Floor  
Charleston, WV 25301

/s/ Richard W. Walters  
Richard W. Walters (WVSB #6809)